196.0	0.583	262.0	0.892
197.0	0.574	263.0	0.891
198.0	0.564	264.0	0.889
199.0	0.555	265.0	0.888
200.0	0.546	266.0	0.887
201.0	0.553	267.0	0.885
202.0	0.560	268.0	0.884
203.0	0.568	269.0	0.882
204.0	0.575	270.0	0.881
205.0	0.582	271.0	0.889
206.0	0.589	272.0	0.898
207.0	0.596	273.0	0.906
208.0	0.604	274.0	0.914
209.0	0.611	275.0	0.922
210.0	0.618	276.0	0.931
211.0	0.602	277.0	0.939
212.0	0.587	278.0	0.947
213.0	0.571	279.0	0.956
214.0	0.556	280.0	0.964
215.0	0.540	281.0	0.960
216.0	0.524	282.0	0.956
217.0	0.509	283.0	0.952
218.0	0.493	284.0	0.948
219.0	0.478	285.0	0.945
220.0	0.462	286.0	0.941
221.0	0.461	287.0	0.937
222.0	0.461	288.0	0.933
223.0	0.460	289.0	0.929
224.0	0.459	290.0	0.925
225.0	0.459	291.0	0.909
226.0	0.458	292.0	0.893
227.0	0.457	293.0	0.877
228.0	0.456	294.0	0.861
229.0	0.456	295.0	0.846
230.0	0.455	296.0	0.830
231.0	0.468	297.0	0.814
232.0	0.482	298.0	0.798
233.0	0.495	299.0	0.782
234.0	0.509	300.0	0.766
235.0	0.522	301.0	0.748
236.0	0.535	302.0	0.729
237.0	0.549	303.0	0.711
238.0	0.562	304.0	0.692
239.0	0.576	305.0	0.673
240.0	0.589	306.0	0.655
241.0	0.608	307.0	0.636
242.0	0.627	308.0	0.618
243.0	0.646	309.0	0.599
244.0	0.665	310.0	0.581
245.0	0.684	311.0	0.584
246.0	0.703	312.0	0.587
247.0	0.722	313.0	0.590
248.0	0.741	314.0	0.593
249.0	0.760	315.0	0.597
250.0	0.779	316.0	0.600
251.0	0.791	317.0	0.603
252.0	0.802	318.0	0.606
253.0	0.814	319.0	0.609
254.0	0.825	320.0	0.612
255.0	0.837	321.0	0.627
256.0	0.849	322.0	0.641
257.0	0.860	323.0	0.656
258.0	0.872	324.0	0.671
259.0	0.883	325.0	0.685
260.0	0.895	326.0	0.700
261.0	0.894	327.0	0.715

328.0	0.730
329.0	0.744
330.0	0.759
331.0	0.752
332.0	0.745
333.0	0.738
334.0	0.731
335.0	0.724
336.0	0.717
337.0	0.710
338.0	0.703
339.0	0.696
340.0	0.689
341.0	0.683
342.0	0.677
343.0	0.672
344.0	0.666
345.0	0.660
346.0	0.654
347.0	0.648
348.0	0.643
349.0	0.637
350.0	0.631
351.0	0.646
352.0	0.661
353.0	0.676
354.0	0.691
355.0	0.707
356.0	0.722
357.0	0.737
358.0	0.752
359.0	0.767

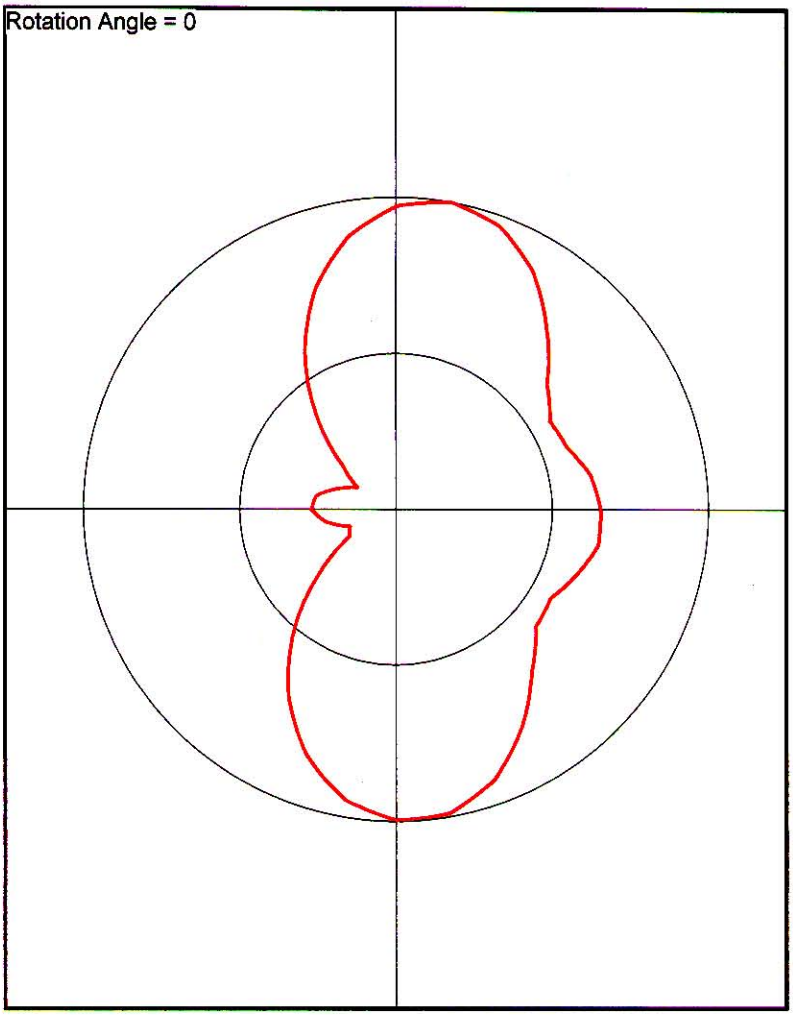
KSTU-DT

Antenna Pattern
Relative Field Values

Antenna Pattern

Pre-Rotation Antenna Pattern....

Azimuth (deg)	Effective Field
0.0	0.972
1.0	0.975
2.0	0.978
3.0	0.980
4.0	0.983
5.0	0.986
6.0	0.989
7.0	0.992
8.0	0.994
9.0	0.997
10.0	1.000
11.0	0.997
12.0	0.993
13.0	0.990
14.0	0.987
15.0	0.983
16.0	0.980
17.0	0.977
18.0	0.974
19.0	0.970
20.0	0.967
21.0	0.958
22.0	0.949
23.0	0.940
24.0	0.931
25.0	0.922
26.0	0.914
27.0	0.905
28.0	0.896
29.0	0.887
30.0	0.878
31.0	0.865
32.0	0.853
33.0	0.840
34.0	0.827
35.0	0.815
36.0	0.802
37.0	0.789
38.0	0.776
39.0	0.764
40.0	0.751
41.0	0.739
42.0	0.727
43.0	0.715
44.0	0.703
45.0	0.691
46.0	0.678
47.0	0.666
48.0	0.654
49.0	0.642
50.0	0.630
51.0	0.624
52.0	0.618
53.0	0.611
54.0	0.605
55.0	0.599
56.0	0.593
57.0	0.587
58.0	0.580
59.0	0.574
60.0	0.568
61.0	0.569
62.0	0.571
63.0	0.573



64.0	0.574	130.0	0.583
65.0	0.575	131.0	0.592
66.0	0.577	132.0	0.601
67.0	0.579	133.0	0.611
68.0	0.580	134.0	0.620
69.0	0.581	135.0	0.629
70.0	0.583	136.0	0.638
71.0	0.588	137.0	0.647
72.0	0.593	138.0	0.657
73.0	0.598	139.0	0.666
74.0	0.603	140.0	0.675
75.0	0.608	141.0	0.688
76.0	0.613	142.0	0.701
77.0	0.618	143.0	0.714
78.0	0.623	144.0	0.727
79.0	0.628	145.0	0.740
80.0	0.633	146.0	0.752
81.0	0.635	147.0	0.765
82.0	0.637	148.0	0.778
83.0	0.640	149.0	0.791
84.0	0.642	150.0	0.804
85.0	0.644	151.0	0.816
86.0	0.646	152.0	0.827
87.0	0.648	153.0	0.839
88.0	0.651	154.0	0.850
89.0	0.653	155.0	0.862
90.0	0.655	156.0	0.874
91.0	0.655	157.0	0.885
92.0	0.655	158.0	0.897
93.0	0.655	159.0	0.908
94.0	0.655	160.0	0.920
95.0	0.655	161.0	0.927
96.0	0.656	162.0	0.934
97.0	0.656	163.0	0.940
98.0	0.656	164.0	0.947
99.0	0.656	165.0	0.954
100.0	0.656	166.0	0.961
101.0	0.652	167.0	0.968
102.0	0.647	168.0	0.974
103.0	0.643	169.0	0.981
104.0	0.639	170.0	0.988
105.0	0.635	171.0	0.989
106.0	0.630	172.0	0.990
107.0	0.626	173.0	0.990
108.0	0.622	174.0	0.991
109.0	0.617	175.0	0.992
110.0	0.613	176.0	0.993
111.0	0.609	177.0	0.994
112.0	0.604	178.0	0.994
113.0	0.600	179.0	0.995
114.0	0.596	180.0	0.996
115.0	0.592	181.0	0.991
116.0	0.587	182.0	0.986
117.0	0.583	183.0	0.981
118.0	0.579	184.0	0.976
119.0	0.574	185.0	0.970
120.0	0.570	186.0	0.965
121.0	0.571	187.0	0.960
122.0	0.573	188.0	0.955
123.0	0.574	189.0	0.950
124.0	0.575	190.0	0.945
125.0	0.577	191.0	0.934
126.0	0.578	192.0	0.924
127.0	0.579	193.0	0.913
128.0	0.580	194.0	0.903
129.0	0.582	195.0	0.892

196.0	0.882	262.0	0.237
197.0	0.871	263.0	0.241
198.0	0.861	264.0	0.246
199.0	0.850	265.0	0.250
200.0	0.840	266.0	0.254
201.0	0.825	267.0	0.259
202.0	0.810	268.0	0.263
203.0	0.795	269.0	0.268
204.0	0.780	270.0	0.272
205.0	0.765	271.0	0.271
206.0	0.750	272.0	0.270
207.0	0.735	273.0	0.269
208.0	0.720	274.0	0.268
209.0	0.705	275.0	0.267
210.0	0.690	276.0	0.265
211.0	0.672	277.0	0.264
212.0	0.654	278.0	0.263
213.0	0.636	279.0	0.262
214.0	0.618	280.0	0.261
215.0	0.600	281.0	0.255
216.0	0.582	282.0	0.249
217.0	0.564	283.0	0.242
218.0	0.546	284.0	0.236
219.0	0.528	285.0	0.230
220.0	0.510	286.0	0.224
221.0	0.491	287.0	0.218
222.0	0.473	288.0	0.211
223.0	0.454	289.0	0.205
224.0	0.435	290.0	0.199
225.0	0.416	291.0	0.193
226.0	0.398	292.0	0.188
227.0	0.379	293.0	0.182
228.0	0.360	294.0	0.177
229.0	0.342	295.0	0.171
230.0	0.323	296.0	0.165
231.0	0.308	297.0	0.160
232.0	0.293	298.0	0.154
233.0	0.278	299.0	0.149
234.0	0.263	300.0	0.143
235.0	0.248	301.0	0.151
236.0	0.233	302.0	0.159
237.0	0.218	303.0	0.167
238.0	0.203	304.0	0.175
239.0	0.188	305.0	0.183
240.0	0.173	306.0	0.192
241.0	0.171	307.0	0.200
242.0	0.170	308.0	0.208
243.0	0.168	309.0	0.216
244.0	0.167	310.0	0.224
245.0	0.165	311.0	0.241
246.0	0.163	312.0	0.258
247.0	0.162	313.0	0.276
248.0	0.160	314.0	0.293
249.0	0.159	315.0	0.310
250.0	0.157	316.0	0.327
251.0	0.164	317.0	0.344
252.0	0.171	318.0	0.362
253.0	0.178	319.0	0.379
254.0	0.185	320.0	0.396
255.0	0.193	321.0	0.415
256.0	0.200	322.0	0.434
257.0	0.207	323.0	0.452
258.0	0.214	324.0	0.471
259.0	0.221	325.0	0.490
260.0	0.228	326.0	0.509
261.0	0.232	327.0	0.528

328.0	0.546
329.0	0.565
330.0	0.584
331.0	0.601
332.0	0.618
333.0	0.635
334.0	0.652
335.0	0.669
336.0	0.687
337.0	0.704
338.0	0.721
339.0	0.738
340.0	0.755
341.0	0.768
342.0	0.782
343.0	0.795
344.0	0.808
345.0	0.822
346.0	0.835
347.0	0.848
348.0	0.861
349.0	0.875
350.0	0.888
351.0	0.896
352.0	0.905
353.0	0.913
354.0	0.922
355.0	0.930
356.0	0.938
357.0	0.947
358.0	0.955
359.0	0.964

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of	)
Fox Television Stations, Inc.	)
KSTU-DT, Salt Lake City, Utah	)
Facility ID No. 22215	)
Digital Television Table of Allotments	)

PETITION FOR RULEMAKING

Fox Television Stations, Inc. ("FTS"), licensee of KSTU-DT, Salt Lake City, Utah, pursuant to Section 1.420 of the Commission's rules,[1] requests that the Commission amend its Digital Television Table of Allotments (the "DTV Table"), 47 CFR § 73.622(i), to substitute channel 28 as the post-transition channel for KSTU-DT in place of channel 13 and to amend Appendix B to the DTV Table to permit the station to serve the public with the maximized facility described in the Engineering Statement attached hereto. KSTU-DT is currently broadcasting on digital channel 28 during the pre-transition period while KSTU-TV is on analog channel 13. As explained below, this amendment to the DTV Table will not cause any new interference and it will result in significant advantages to the public.

[1] 47 CFR § 1.420.

FTS files its petition at this time in response to the Commission's Public Notice of May 30, 2008,[2] which lifted the freeze on the filing of petitions for rulemaking to substitute DTV channels and permitted stations to seek facilities that exceed the parameters in Appendix B.

1. The Proposed Amendment Would Cause No New Interference.

FTS has engaged Smith and Fisher, broadcasting consultants, to conduct an engineering study of the results of operations on a maximized channel 28 post-transition. As explained in the Engineering Statement attached as Exhibit A to this petition, such operation would cause no new interference to the currently authorized post-transition operations of any full-power digital television station or to any Class A LPTV station.

2. The Proposed Amendment Would Enable KSTU-DT to Serve a Larger Audience.

If the Commission grants this petition, FTS intends to increase the station's ERP from the 350 kW at which it now operates to 1,000 kW, enabling it to serve over 6,700 more viewers than it could at the Appendix B parameters. See Exhibit B.[3]

3. The Proposed Amendment Would Aid in a Smooth Transition to Digital Broadcasting in the Salt Lake City Market.

Optimal reception of digital television stations over-the-air may require different types of antennas for UHF and VHF signals. Viewers who have purchased and installed antennas to

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[2] "Commission Lifts the Freeze on the Filing of Maximization Applications and Petitions for Digital Channel Substitutions, Effective Immediately," DA 08-1213.

[3] Exhibit B is a map comparing the 36 dBu contour of the Appendix B facility on channel 13 and the 41 dBu contour of the proposed maximized facility on channel 28. Although the maximization would not serve sparsely populated areas to the southwest, the loss of an estimated 156 viewers would be more than compensated by the additional homes served in the northern areas.

receive KSTU-DT at 554-560 MHz (UHF channel 28) especially those at considerable distances from FTS's transmitter in the vast Salt Lake City DMA, could receive a less robust signal at 210-216 MHz (VHF channel 13) unless they add a VHF antenna element. The proposed amendment would eliminate that need. Indeed, in the current DTV Table, KSTU-DT is the only station licensed to Salt Lake City that has been assigned a VHF channel. Accordingly, the proposed amendment will benefit over-the-air viewers in Salt Lake City: they need do nothing to continue viewing KSTU-DT with the quality to which they have become accustomed and the transition in February will be that much easier. The proposed amendment may even save viewers the cost of modifying their antennas.

Additionally, because the DTV Table currently assigns to KSTU-DT the channel it is using for analog broadcasts, without the proposed amendment the station would be required to implement a "phased transition" to post-transition digital broadcasting, with the possibility of inconvenience and confusion for the public.[4] The proposed amendment to the DTV Table would mean that KSTU would only need to cease analog broadcasts on channel 13 to meet the transition deadline.

4. Continuing Broadcasts on Channel 28 Will Save Valuable Resources.

The Commission has noted that broadcast equipment manufacturers, suppliers, and installation personnel will be struggling to meet the demands of broadcasters that need new products and services in preparation for the digital transition next February.[5] The proposal that

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[4] *See* Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, 23 FCC Rcd. 2994, ¶ 88 *et. seq.*

[5] *See, e.g.*, Id., ¶ 72.

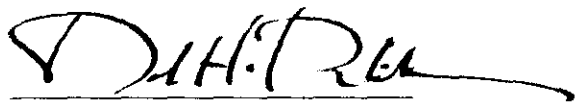
FTS makes in this petition would permit KSTU-DT to meet the transition without using such additional resources, leaving them available for other broadcasters.

5. Conclusion.

FTS proposes an amendment to the DTV Table of Allotments that would permit KSTU-DT to continue operating permanently on its pre-transition channel, 28. This amendment, along with the maximization that FTS is prepared to implement, will provide improved service and convenience to the public and will result in the preservation of valuable resources. Accordingly, FTS requests that the Commission grant this petition.

Respectfully submitted,

FOX TELEVISION STATIONS, INC.

By: 

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Its Attorneys

Dated: June 19, 2008

Fox Television Stations, Inc.
KSTU-DT, Salt Lake City, Utah
Facility ID No. 22215
Digital Television Table of Allotments

Exhibit A

Engineering Statement

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of FOX TELEVISION STATIONS, INC., licensee of KSTU-DT on Channel 28 in Salt Lake City, Utah, in support of its Petition for Rulemaking to substitute Channel 28 for Channel 13 in the Commission's Digital Television Table of Allotments for post-transition operation. The proposed channel is currently the licensed digital channel for KSTU-DT. If the Petition is granted, the station will simply increase the effective radiated power of the licensed digital facility at the existing site, using the presently licensed digital antenna pattern.

Attached is the engineering portion of an FCC application for the proposed facility. In it, the operating parameters of the station are provided. As shown in the engineering report, operation on the new channel with the specified parameters will result in a facility that places the requisite city-grade contour over the city of license, meets the FCC's interference requirements to all post-transition DTV facilities (and Class A LPTV stations), and satisfies the Commission's human exposure guidelines to nonionizing electromagnetic radiation.

Accordingly, it is respectfully requested that the Commission substitute the allotment channel for KSTU-DT (with the specified operating parameters) in the digital television allotment table in Section 73.622(i) of the FCC Rules as follows:

Present Allotment	Proposed Allotment
Salt Lake City, UT	Salt Lake City, UT
13, 20, 34, 38, 40, *42, 46	20, 28, 34, 38, 40, *42, 46

I declare, under penalty of perjury, that the foregoing statements and attached engineering report, which was prepared by me, is true and correct to the best of my knowledge and belief.

KEVIN T. FISHER

June 17, 2008

Section III - D - DTV Engineering

Complete Questions 1-5 and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.

Pre-Transition Certification Checklist: An application concerning a pre-transition channel must complete questions 1(a)-(c), and 2-5. A correct answer of "Yes" to all of the questions will ensure an expeditious grant of a construction permit application to modify pre-transition facilities. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.

Post-Transition Expedited Processing. An application concerning a post-transition channel must complete questions 1(a), (d)-(e), and 2-5. A station applying for a construction permit to build its post-transition channel will receive expedited processing if its application (1) does not seek to expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"); (2) specifies facilities that match or closely approximate those defined in the new DTV Table Appendix B facilities; and (3) is filed on or before March 17, 2008 (45 days of the Report and Order in the Third DTV Periodic Review proceeding, MB Docket No. 07-91).

1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:

   (a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622. ☐ Yes ☒ No

   (b) It will operate a pre-transition facility from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622. ☒ Yes ☐ No

   (c) It will operate a pre-transition facility with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622. ☐ Yes ☒ No

   (d) It will operate at post-transition facilities that do not expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"). ☐ Yes ☒ No ☐ N/A

   (e) It will operate at post-transition facilities that match or reduce by no more than five percent with respect to predicted population from those defined in the DTV Table Appendix B. ☒ Yes ☐ No ☐ N/A

2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. ☒ Yes ☐ No

   Applicant must **submit the Exhibit** called for in Item 13.

3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community. ☒ Yes ☐ No

4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable. ☒ Yes ☐ No

5. The antenna structure to be used by this facility has been registered by the Commission and will not require reregistration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7. ☒ Yes ☐ No

SECTION III-D DTV Engineering

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Channel Number: DTV 28 Analog TV, if any 13

2. Zone: ☐ I ☒ II ☐ III

3. Antenna Location Coordinates: (NAD 27)

   40 ° 39 ' 33 " ☒ N ☐ S Latitude

   112 ° 12 ' 08 " ☐ E ☒ W Longitude

4. Antenna Structure Registration Number: _____

   ☒ Not applicable ☐ FAA Notification Filed with FAA

5. Antenna Location Site Elevation Above Mean Sea Level: 2,733.3 meters

6. Overall Tower Height Above Ground Level: 55.5 meters

7. Height of Radiation Center Above Ground Level: 51.2 meters

8. Height of Radiation Center Above Average Terrain: 1,210 meters

9. Maximum Effective Radiated Power (average power): 1,000 kW

10. Antenna Specifications:

	Manufacturer	Model
a.	Dielectric	TFU-12JTH-R CT220

b. Electrical Beam Tilt: 1.5 degrees ☐ Not Applicable

c. Mechanical Beam Tilt: _____ degrees toward azimuth _____ degrees True ☒ Not Applicable

Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c). Exhibit No. B

d. Polarization: ☒ Horizontal ☐ Circular ☐ Elliptical

TECH BOX

e. Directional Antenna Relative Field Values: ☐ Not applicable (Nondirectional)

Rotation: _____ ° ☒ No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0	0.972	60	0.568	120	0.570	180	0.996	240	0.173	300	0.143
10	1.000	70	0.583	130	0.583	190	0.945	250	0.157	310	0.224
20	0.967	80	0.633	140	0.675	200	0.840	260	0.228	320	0.396
30	0.878	90	0.655	150	0.804	210	0.690	270	0.272	330	0.584
40	0.751	100	0.656	160	0.920	220	0.510	280	0.261	340	0.755
50	0.630	110	0.613	170	0.988	230	0.323	290	0.199	350	0.888
Additional Azimuths											

If a directional antenna is proposed, the requirements of 47 C.F.R. Section 73.625(c) must be satisfied. **Exhibit required.** Exhibit No. B

11. Does the proposed facility satisfy the interference protection provisions of 47 C.F.R. Section 73.623(a)? (Applicable only if **Certification Checklist** Items 1(a), (b), or (c) are answered "No.") ☒ Yes ☐ No

If "No," attach as an Exhibit justification therefor, including a summary of any related previously granted waivers. Exhibit No. D

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefor. (Applicable only if **Certification Checklist** Item 3 is answered "No.") Exhibit No. C

13. **Environmental Protection Act. Submit in an Exhibit** the following: Exhibit No. E

a. If **Certification Checklist** Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R. Section 1.1311.

PREPARER'S CERTIFICATION IN SECTION III MUST BE COMPLETED AND SIGNED.

13. **Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments.** If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. Section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application. ☐ Yes ☐ No ☐ N/A

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing	Typed or Printed Title of Person Signing
Signature	**Date**

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name	Relationship to Applicant (e.g., Consulting Engineer)	
KEVIN T. FISHER	Broadcast Consultant	
Signature	**Date**	
	June 17, 2008	
Mailing Address		
SMITH and FISHER, 2237 Tackett's Mill Drive, Suite A		
City	**State or Country (if foreign address)**	**ZIP Code**
Lake Ridge	Virginia	22191
Telephone Number (include area code)	**E-Mail Address (if available)**	
(703) 494-2101	Kevin@smithandfisher.com	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of FOX TELEVISION STATIONS, INC., licensee of KSTU-DT, Channel 28 in Salt Lake City, Utah, in support of its Application for Construction Permit to operate with a maximized post-transition DTV facility on Channel 28. This application specifies the same operating parameters as those in the station's Petition for Rulemaking to change the allotted DTV channel from Channel 13 to Channel 28.

It is proposed to utilize the present Dielectric directional antenna which is mounted at the 51-meter level of an existing 56-meter tower. Exhibit B provides elevation and azimuth pattern data for the licensed antenna. Exhibit C is a map upon which the predicted service contours are plotted. As shown, the city of license is completely contained within the proposed 48 dBu service contour. An interference study is included in Exhibit D, and it is important to note that the study utilized a cell size of 2.0 kilometers and an increment spacing of 1.0 kilometers. A power density calculation is provided in Exhibit E.

It is important to note that, while the proposed effective radiated power of 1000 kw exceeds that allowable in Section 73.622(f)(8)(i) of the Commission's Rules, the coverage of the facility proposed herein does not exceed that of the largest station in the market (KSL-DT, Channel 38 in Salt Lake City, Utah), as allowed in Section 73.622(f)(5) of the Rules.

It is not expected that the proposed facility would cause objectionable interference to any other broadcast or non-broadcast station authorized to operate at or near the KSTU-DT site.

EXHIBIT A

However, if such should occur, the owner of this station recognizes its obligation to take whatever corrective actions are necessary.

Since no change in overall height or location of the existing tower is proposed herein, the FAA has not been notified of this application. Due to the diminutive height of the tower and its proximity to the nearest airport runway, FCC antenna structure registration is not required. This conclusion is supported by the Commission's TOWAIR Program.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

KEVIN T. FISHER

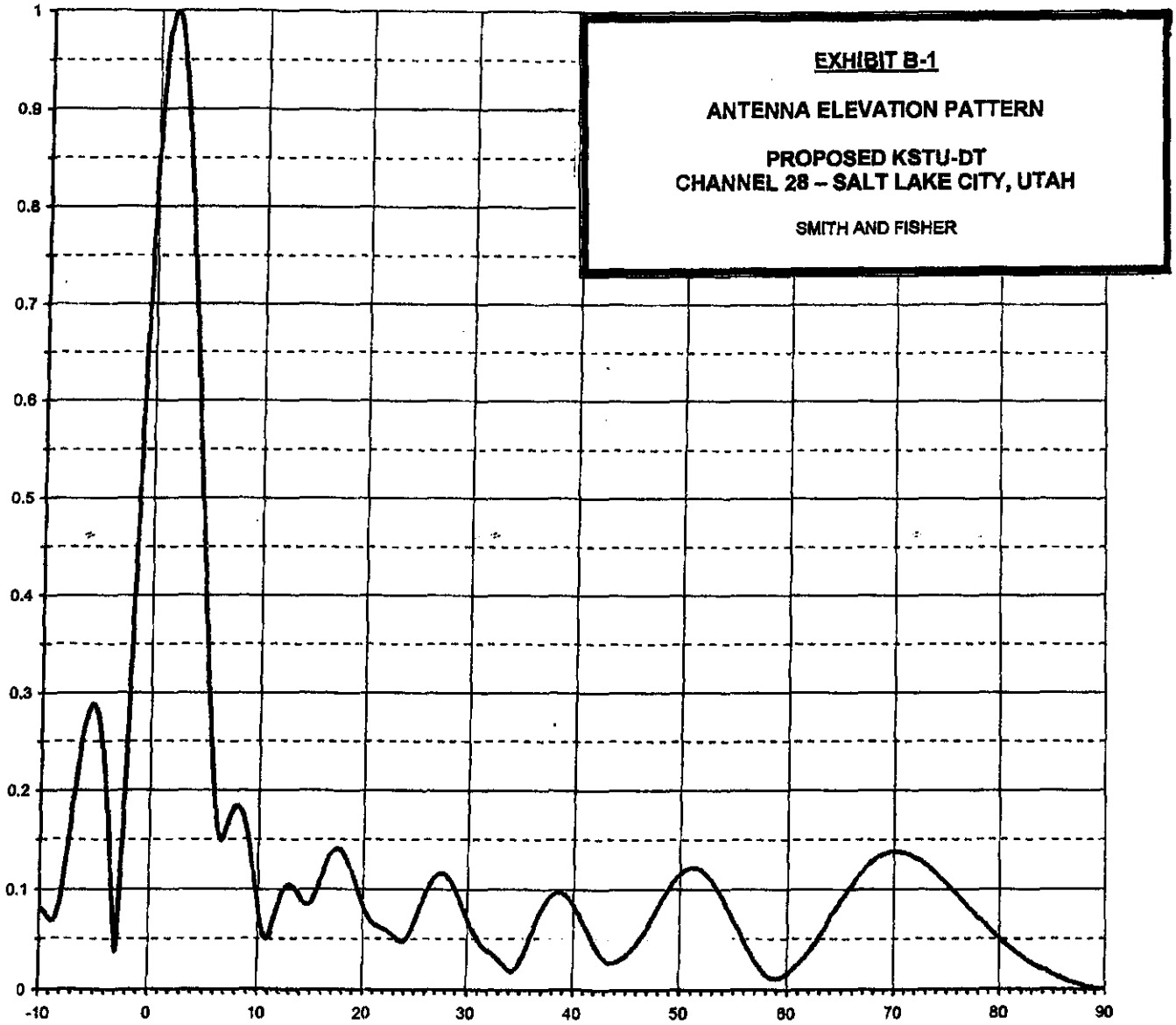
June 17, 2008

Dielectric

Proposal Number	DCA-10833	Revision:	1
Date	30-Mar-05		
Call Letters	KSTU-DT	Channel	28
Location	Salt Lake City, UT		
Customer			
Antenna Type	TFU-12JTH-R CT220		

ELEVATION PATTERN

RMS Gain at Main Lobe	12.73 (11.05 dB)	Beam Tilt	1.50 deg
RMS Gain at Horizontal	9.00 (9.54 dB)	Frequency	557.00 MHz
Calculated / Measured	Calculated	Drawing #	12J120150-90



Dielectric

Proposal Number	DCA-10833	Revision:	1
Date	30-Mar-05		
Call Letters	KSTU-DT	Channel	28
Location	Salt Lake City, UT		
Customer			
Antenna Type	TFU-12JTH-R CT220		

AZIMUTH PATTERN

Gain	2.20 (3.42 dB)	Frequency	557.00 MHz
Calculated / Measured	Calculated	Drawing #	TFU-CT220

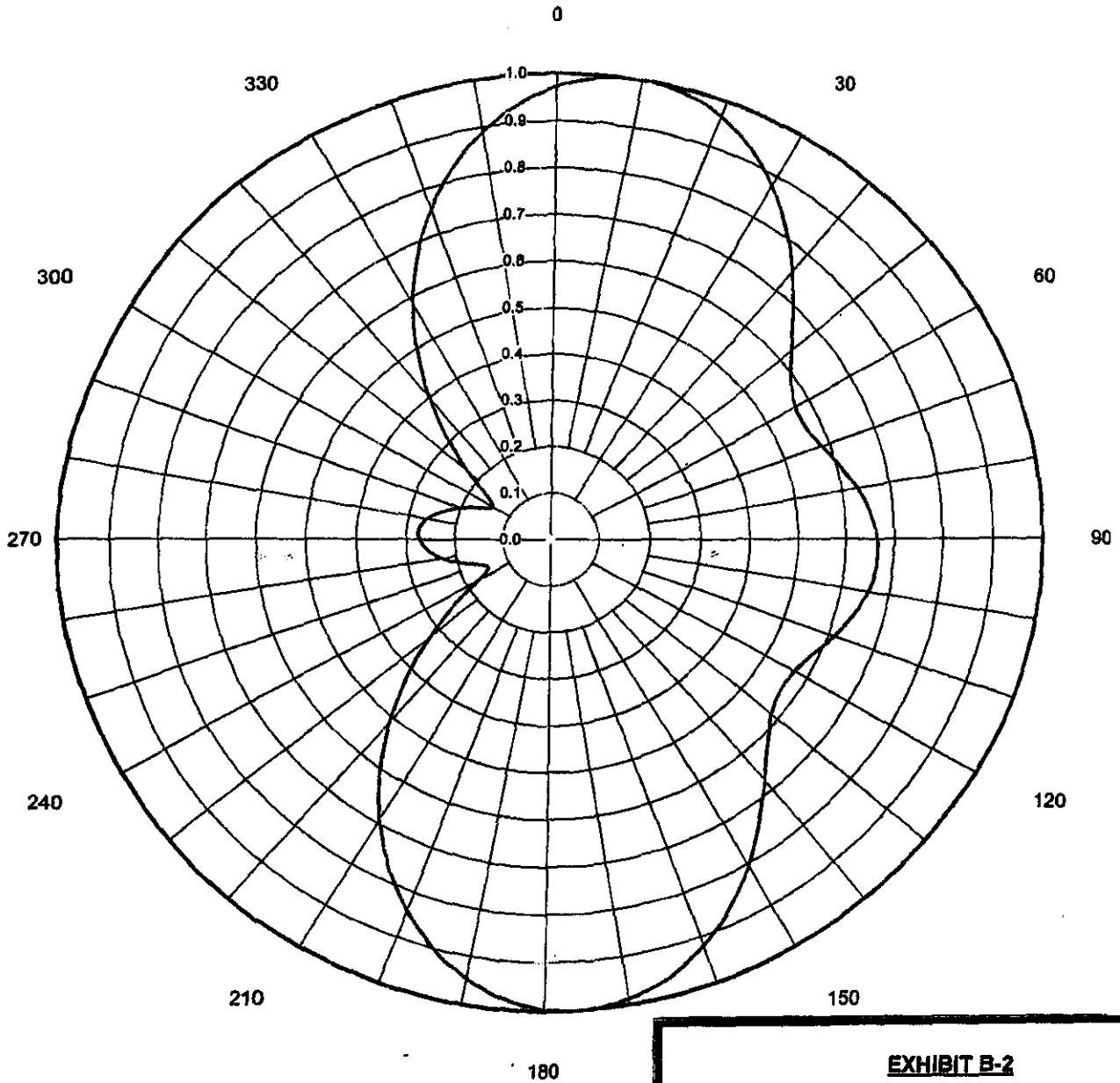


EXHIBIT B-2

ANTENNA AZIMUTH PATTERN

PROPOSED KSTU-DT
CHANNEL 28 – SALT LAKE CITY, UTAH

SMITH AND FISHER

EXHIBIT B-3

ANTENNA AZIMUTH PATTERN DATA

PROPOSED KSTU-DT
CHANNEL 28 – SALT LAKE CITY, UTAH

Azimuth (° T)	Relative Field	ERP (dbk)	Azimuth (° T)	Relative Field	ERP (dbk)
0	0.972	29.8	180	0.996	30.0
10	1.000	30.0	190	0.945	29.5
20	0.967	29.7	200	0.840	28.5
30	0.878	28.9	210	0.690	26.8
40	0.751	27.5	220	0.510	24.2
50	0.630	26.0	230	0.323	20.2
60	0.568	25.1	240	0.173	14.8
70	0.583	25.3	250	0.157	13.9
80	0.633	26.0	260	0.228	17.2
90	0.655	26.3	270	0.272	18.7
100	0.656	26.3	280	0.261	18.3
110	0.613	25.7	290	0.199	16.0
120	0.570	25.1	300	0.143	13.1
130	0.583	25.3	310	0.224	17.0
140	0.675	26.6	320	0.396	22.0
150	0.804	28.1	330	0.584	25.3
160	0.920	29.3	340	0.755	27.6
170	0.988	29.9	350	0.888	29.0

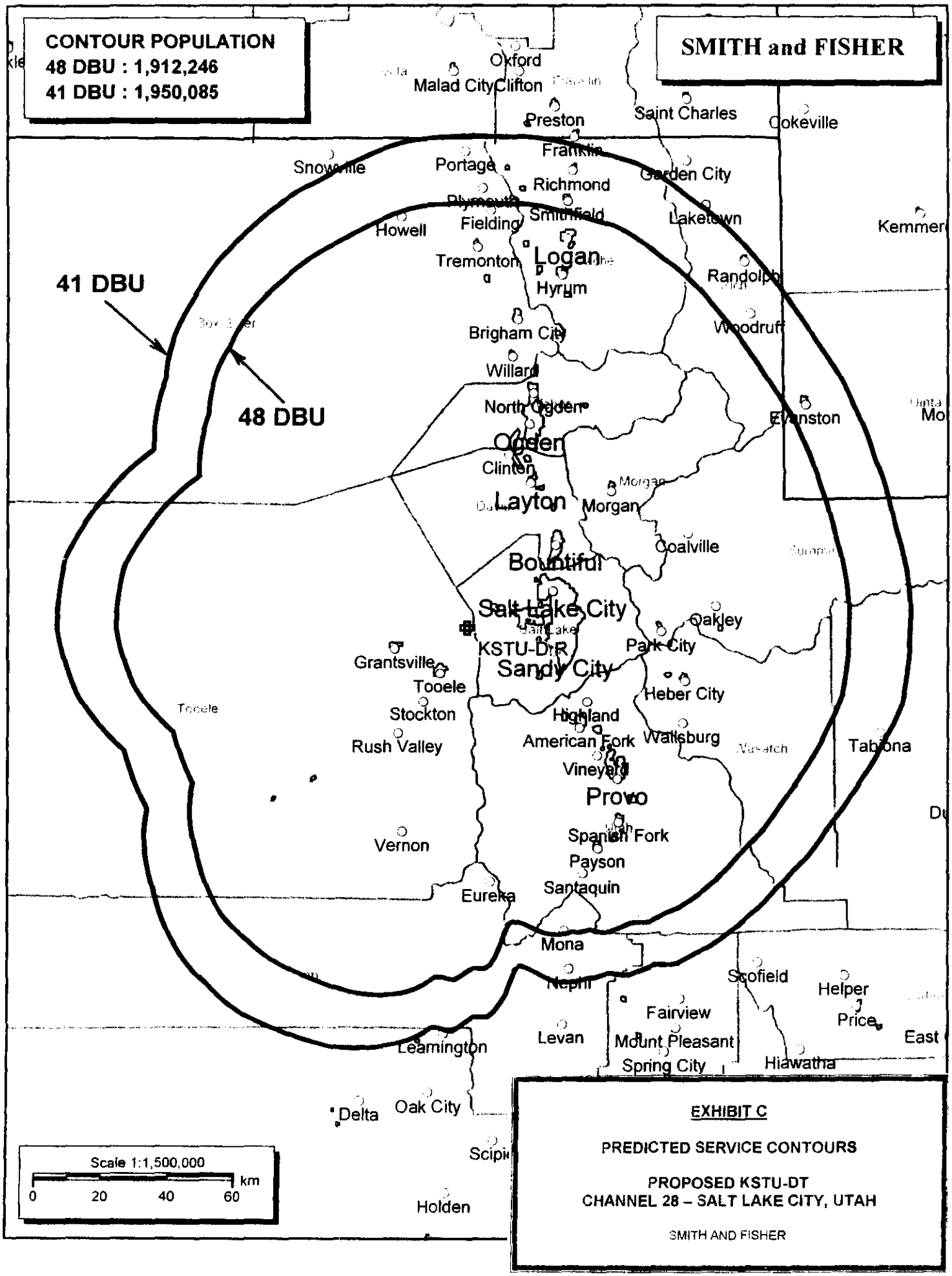

CONTOUR POPULATION
48 DBU : 1,912,246
41 DBU : 1,950,085
SMITH and FISHER
41 DBU
48 DBU
Oxford
Malad City
Clifton
Preston
Saint Charles
Cokeville
Franklin
Snowville
Portage
Richmond
Garden City
Plymouth
Fielding
Smithfield
Howell
Laketown
Kemmerer
Tremonton
Logan
Hyrum
Randolph
Brigham City
Woodruff
Willard
North Ogden
Evanston
Ogden
Clinton
Layton
Morgan
Coalville
Bountiful
Salt Lake City
Oakley
KSTU-DT
Park City
Grantsville
Sandy City
Tooele
Heber City
Stockton
Highland
Rush Valley
American Fork
Wallsburg
Tabiona
Vineyard
Provo
Vernon
Spanish Fork
Payson
Eureka
Santaquin
Mona
Nephi
Scofield
Helper
Fairview
Price
Levan
Mount Pleasant
East
Leamington
Spring City
Hiawatha
Delta
Oak City
Holden
Scale 1:1,500,000
km
0
20
40
60
EXHIBIT C
PREDICTED SERVICE CONTOURS
PROPOSED KSTU-DT
CHANNEL 28 – SALT LAKE CITY, UTAH
SMITH AND FISHER

EXHIBIT D-1

INTERFERENCE STUDY

PROPOSED KSTU-DT
CHANNEL 28 – SALT LAKE CITY, UTAH

The instant application specifies an ERP of 1000 kw (omnidirectional) at 1,210 meters above average terrain, which we have determined to be allowable under the FCC's recently approved interference standards with respect to various post-transition digital television facilities as they will exist on or before February 17, 2009, the date by which all stations must operate with the parameters recently adopted in the Commission's DTV Table of Allotments.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe III" computer program, which has been found generally to mimic the FCC's program. In conducting our studies, we employed a cell size of 2.0 kilometers and an increment spacing of 1.0 kilometer along each radial. In addition, we utilized the 2000 U.S. Census. Changes in interference caused by proposed KSTU-DT to other pertinent stations are tabulated in Exhibit D-2.

As shown, the proposed KSTU-DT facility would not contribute more than 0.5% interference (beyond that which is caused by the allotted KSTU-DT facility) to the service population of any potentially affected post-transition DTV station.

A Longley-Rice interference study also reveals that the proposed KSTU-DT facility does not cause significant (0.5%) interference within the protected service contour of any potentially affected Class A low power television station.

Therefore, this proposal meets the FCC's *de minimis* interference standards for DTV operations.